

LITE DEPALMA GREENBERG & RIVAS, LLC

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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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SUSAN DOUGHERTY, on Behalf of Herself	:	
and All Others Similarly Situated, and	:	CIVIL ACTION
Derivatively on Behalf of Nominal Defendant	:	
CADBURY PLC,	:	NO. 09-6406 (DMC)
	:	
Plaintiff,	:	PLAINTIFF SUSAN DOUGHERTY'S
	:	NOTICE OF MOTION TO CONSOLIDATE
v.	:	RELATED ACTIONS AND APPOINT
	:	INTERIM CLASS AND LEAD
ROGER CARR, TODD STITZER, ANDREW	:	DERIVATIVE COUNSEL
BONFIELD, WOLFGANG BERNDT, GUY	:	
ELLIOT, LORD PATTEN, RAYMOND	:	
VIAULT, BARONESS HOGG, and COLIN	:	
DAY,	:	
	:	
Defendants,	:	
	:	
and	:	
	:	
CADBURY PLC,	:	
	:	
Nominal Defendant	:	

STEWART INTERNATIONAL ENHANCED	:	
INDEX FUND, Derivatively On Behalf of	:	CIVIL ACTION
Cadbury PLC,	:	
	:	NO. 09-5006 (DMC)
Plaintiff,	:	
	:	
vs.	:	
	:	
ROGER CARR, TODD STITZER, ANDREW	:	RETURN DATE: FEBRUARY 1, 2010
R.J. BONFIELD, WOLFGANG BERNDT,	:	
GUY ELLIOT, RAYMOND VIAULT,	:	
COLIN R. DAY, BARONESS SARAH	:	
ELIZABETH MARY HOGG and LORD	:	
CHRISTOPHER FRANCIS PATTEN,	:	
	:	
Defendants,	:	
	:	
-and-	:	
	:	
CADBURY PLC, An English Corporation,	:	
	:	
Nominal Defendant.	:	

PLEASE TAKE NOTICE that on February 1, 2010 at 10:00 a.m., or soon thereafter as counsel may be heard, Plaintiff Susan Dougherty (“Plaintiff”), through her undersigned attorneys, will move before the Honorable Dennis M. Cavanaugh, U.S.D.J., at the U.S. District Court, Frank R. Lautenberg U.S.P.O. & Courthouse, Federal Square, Newark, New Jersey 07102 for an Order pursuant to Rule 42 of the Federal Rules of Civil Procedure to consolidate the above-captioned related shareholder class and derivative actions. Plaintiff further moves the Court pursuant to Rules 23(g) and 23.1 of the Federal Rules of Civil Procedure for an order to appoint her counsel, Barroway Topaz Kessler Meltzer & Check, LLP and Lite DePalma Greenberg & Rivas, LLC, as Interim Class Counsel and Lead Derivative Counsel. For the reasons stated in Plaintiff’s accompanying Memorandum and the Declaration of Michael Wagner

in support hereof, Plaintiff's motion should be granted and the Court should enter the proposed order submitted herewith.

Respectfully submitted,

Date: December 31, 2009

By: **LITE DEPALMA GREENBERG & RIVAS, LLC**

/s/ Joseph J. DePalma

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